

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

COCO RICO, LLC

PLAINTIFF

VS.

UNIVERSAL INSURANCE COMPANY

DEFENDANT

CIVIL NO. 21-01390 (MEL)

**JOINT MOTION REQUESTING MODIFICATION OF CERTAIN CASE DEADLINES**

TO THE HONORABLE COURT:

**COME NOW**, the parties, through their counsels of record, and respectfully request and pray as follows:

1. This honorable court as per ECF 26, on February 9, 2022, set the discovery timetable in the present case.
2. Because of previous work commitments and other unforeseen circumstances, plaintiff's experts have not been able to complete their expert reports related to the present case nor the plaintiff has been able to produce certain discovery requests that are dependent on the expert reports to be produced.
3. Both parties met at the request of the plaintiff, to discuss certain events deadline modifications as per the timetable set by this Honorable Court. The parties agreed to jointly submit the requested changes to certain discovery events only, keeping the rest of them unaltered. It is not foreseen that other changes be needed to the events calendar of this case.
4. It is jointly respectfully requested that this honorable court allow the modification of certain event deadlines as follows:

**EVENT****NEW DEADLINE**

Tender Answers to Defendant's Interrogatories and production of documents	May 5, 2022
Serve Plaintiff's Expert Report	May 5, 2022
Serve Subpoenas	May 5, 2022
Objections to Answers	June 6, 2022
Motion to Compel Answer	June 20, 2022
Motion to Dismiss	July 20, 2022
Opposition to Motion to Dismiss	August 22, 2022
Depositions	August 2, 16, 30, 31, 2022

**WHEREFORE**, the parties jointly request that the modification of the events suggested by the parties are approved and allowed by this honorable court.

**WE CERTIFY:** that the foregoing motion was filed with the Clerk of the Court and notified to the parties, via the CM/ECF system of the Court.

Respectfully Submitted in San Juan, Puerto Rico, this 19<sup>th</sup> day of April, 2022

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